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Attorney for Defendant,

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

**JOHN CORTES,
INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS
SIMILARLY SITUATED,**

Plaintiff,

v.

**CURACAO, LTD., A
CALIFORNIA LIMITED
PARTNERSHIP; ADIR
INTERNATIONAL, LLC DBA
CURACAO,**

Defendants.

Case No.: 13-cv-589 BEN (DHB)

**JOINT MOTION FOR DISMISSAL
OF THE ACTION WITHOUT
PREJUDICE PURSUANT TO
F.R.C.P. 41(A)(1)**

HON. ROGER T. BENITEZ

1 Plaintiff JOHN CORTES (“Plaintiff”) and Defendants CURACAO, LTD. A
 2 CALIFORNIA LIMITED PARTNERSHIP; and, ADIR INTERNATIONAL, LLC
 3 DBA CURACAO (“Defendants”), by and through their undersigned counsel,
 4 respectfully submit this Joint Motion for Dismissal pursuant to Rule 41(a)(1) of the
 5 Federal Rules of Civil Procedure.
 6

7 Plaintiff and Defendants hereby jointly move to dismiss the Action
 8 WITHOUT PREJUDICE. Each party to bear their own fees and costs.
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 11 Date: November 22, 2013

KAZEROUNI LAW GROUP, APC

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 13 By: /s/ Abbas Kazerounian
 14 ABBAS KAZEROUNIAN, ESQ.
 15 ATTORNEY FOR PLAINTIFF, JOHN CORTES

16 Date: November 22, 2013

ADIR INTERNATIONAL, LLC DBA CURACAO

17
 18 By: /s/ David N. Buffington
 19 DAVID N. BUFFINGTON, ESQ.
 20 ATTORNEY FOR DEFENDANTS, CURACAO LTD; AND, ADIR INTERNATIONAL, LLC DBA
 21 CURACAO
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SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to David N. Buffington, Esq., counsel for Defendant, and that I have obtained Mr. Buffington's authorization to affix his electronic signature to this document.

Date: November 22, 2013

KAZEROUNI LAW GROUP, APC

By: /s/ Abbas Kazerounian

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